



Dec. 9, 1999

1639 '00 JAN -4 P2:05

RECEIVED
12/21/99

Office of Special Nutritionals
HFS-450
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 C St. SW
Washington DC 20204

Statement of Nutritional Support – FOLIC ACID

Pursuant to 21 CFR Part 101.93, American Specialty Health and Wellness (ASHW) files the following Statement of Nutritional Support for the Dietary Supplement marketed as FOLIC ACID

1) Name and Address of Distributor: ASHW 8989 Rio San Diego Drive, Suite 250, San Diego, CA 92108.

2) Text of Nutritional Support Statement being made:

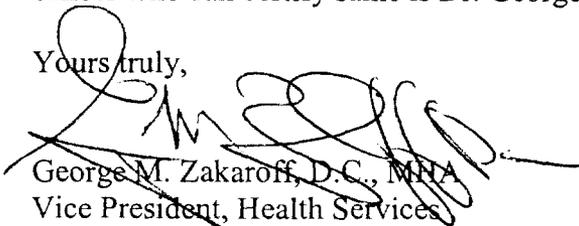
“Folic acid helps the body make DNA and RNA, two molecules which are the basis for cellular reproduction. Folic acid also helps support healthy blood cell production. Women who take steps to ensure their folate intake is adequate throughout their childbearing years may reduce their risk of having a child with a neural tube defect. Such birth defects, while not widespread, are very serious. They can have many causes. Adequate amounts of folate, a B vitamin, can be obtained from diets rich in citrus fruits and juices, dark green leafy vegetables and legumes, enriched grain products such as breads, rice, and pasta, fortified cereal, or a supplement. Folate consumption should be limited to 1,000 mcg. per day from all sources.”

3) Name of dietary ingredient: See attached product label.

4) Brand Name: FOLIC ACID

5) Substantiation information on file at the company office. The corporate officer who can certify same is Dr. George Zakaroff, Vice President.

Yours truly,



George M. Zakaroff, D.C., MHA
Vice President, Health Services

975 - 0162